



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 21, 2023

By ECF

The Honorable Ronnie Abrams
United States District Judge,
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. Bevan Cooney, 16 Cr. 371 (RA)

Dear Judge Abrams:

The Government writes in response to defendant Bevan Cooney's May 31, 2023 motion to modify the terms of his supervised release. In his motion, Cooney requests that the Court (1) terminate his drug testing condition, and (2) modify his conditions of supervision to allow travel to several states without prior authorization from the United States Probation Department (the "Probation Department"). Dkt. 1061.¹

The Government has consulted with Probation Officer Ashley Hunter and understands that Cooney has thus far complied with the drug testing condition and has not tested positive for illegal drugs. Accordingly, the Probation Department and the Government have no objection to the Court terminating Cooney's drug testing condition.

The Government has also consulted with Officer Hunter about Cooney's request to allow travel to Michigan, Ohio, Nevada, California, Idaho, Washington, and New York without prior authorization from the Probation Department. The Probation Department disagrees with many of the representations set forth in Cooney's motion regarding his prior travel requests, and notes that Cooney has not communicated all the bases for his travel requests directly with the Probation Department. The Probation Department is also concerned that Cooney may be expending funds toward personal travel that could be expended toward restitution payments to his victims. The Government has no objection to requests by Cooney to visit family members or participate in

¹ The Government apologizes for the late filing of this letter.

family-related activities in Michigan, Ohio, Nevada, California, Idaho, and Washington. As to Cooney's request to travel to New York to visit friends, the Government takes no position and defers to the Court's usual practices in handling such requests.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/ Negar Tekeei
Negar Tekeei
Assistant United States Attorney
(212) 637-2482

cc: Paula Notari, Esq. (via ECF)